

4WD-SSRB

Mr. James L. Bryant
Chief Engineering Section
Special Projects
Alabama Department of Environmental Management
1890 AA Congressman W. L. Dickinson Drive
Montgomery, Alabama 36109

SUBJ: ADEM Letter of May 16, 1994

Dear Mr. Bryant:

This letter is provided in response to your letter of May 16, 1994 and to clarify the points made in Kenneth Lucas' letter of May 12, 1994. The revised draft Feasibility Study concluded that the no action alternative would be protective because Olin is required to operate the Corrective Action Program (CAP) until the established clean-up standards are achieved. However, EPA has concluded that the CAP, as it currently exist, does not address groundwater contamination coming from the old plant landfill, or the area which contains mercury-contaminated dense brine. The information provided in the remedial investigation report indicated that if these source areas are not addressed directly they will continue to contaminate the groundwater and subsurface soils.

EPA's approval of the revised draft Feasibility Study (FS) stated, "the FS has been determined to be acceptable for the purpose of evaluating remedial alternatives for Operable Unit One." The FS concluded that acceleration of cleanup would be achieved by addition of wells to address the discovered source areas. Even though the CAP is in place, EPA has proposed that additional wells be installed to directly address the discovered sources of contamination. Taking no action would allow the contamination emanating from those discovered source areas to continue to leach and, as groundwater moves toward the current extraction system wells, possibly contaminate presently uncontaminated areas of the site. EPA's selected alternative provides the best balance of the nine criteria established in the NCP for selection of an appropriate remedial alternative.

The NCP requires that the ROD indicate the remediation goals that the remedy is expected to achieve. Some aspects of EPA's selected remedial alternative may eventually be achieved by subsequent modification of the CAP and/or the RCRA Post-Closure Permit; however, those modifications are not in place. Therefore the ROD indicates that the contamination poses a threat to human health and the environment and is not currently being addressed. The ROD requires specific measures that must be taken for remediation. However, it is inappropriate for the ROD to specify that those measures will be accomplished by a permit modification.

If you have any questions please call Kenneth A. Lucas, Remedial Project Manager, at (404) 347-3555 extension 6238.

Sincerely,

Arthur L. Collins, Chief
AL/GA/MS Remedial Section
South Superfund Remedial Branch

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7/31/94